UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

NEXT CLEANERS, LLC,

Plaintiff.

-against-

JONATHAN MIODUSZEWSKI, JON SIMKOWITZ, YELLOW BEAR CLEANERS (WESTFIELD), and YELLOW BEAR CLEANERS (CRANFORD), Civil Action No.

17-cv-0222 (MCA) (MAH)

STATUS REPORT AND CERTIFICATION OF COUNSEL

Pursuant to 28 U.S.C. § 1746, I, **JULIO C. GOMEZ**, of full age certify as follows:

- 1. I am a solo practitioner for the firm GOMEZ LLC Attorney At Law, counsel for Plaintiff Next Cleaners, LLC in the above-captioned matter. I submit this Certification pursuant to the Court's Text Order dated November 13, 2020 (Dkt. No. 102).
- 2. Pursuant to the Court's Order, Defendant Jonathan Mioduszewski's deposition is scheduled for December 9, to be adjourned only with Court approval and with good cause.
- 3. On or about November 18, undersigned counsel began to experience COVID-19 symptoms; my diagnosis was confirmed by a positive test on November 21 and a second positive test on November 24. Since that date I have been out of commission and recovering at home under quarantine; although my condition is improving, I continue to experience symptoms and have begun my third week of quarantine; I am informed I must continue to quarantine until I am symptom free and test negative.
- 4. I have conferred with Mr. Mioduzewski about this matter and he has offered to make himself available to be deposed on January 13, 2021 or alternatively, February 3, to allow

me time to fully recover and prepare.

5. Plaintiff hereby requests that the Court enter a Text Order granting an adjournment of the deposition to be conducted on the dates offered by Mr. Mioduszewski.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2020

*s/Julio C. Gomez*Julio C. Gomez

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